

Agenda Item #6  
RPC 4/6/16

Association of Rural Town Councils  
C/O Three Points-Liebre Mountain Town Council  
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5 April 2016

SENT VIA EMAIL

Los Angeles County Planning Commission  
320 W. Temple St. 13<sup>th</sup> Floor  
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Dear Commissioners Pincetl, Smith, Louie, Pedersen, Modugno, and Ms. Kulczycki,

RE: Project No. R2014-00881-(5), CUP 201400037

At our March 31<sup>st</sup> Association of Rural Town Councils meeting, a motion was passed to support Acton Town Council's concerns regarding this project, especially as they involve Community Standards Districts (CSD) and the Antelope Valley Area Plan (AVAP). Back in November of 2015, the Acton Town Council appealed a case previously approved by your commission, regarding interpretation and application of CSD documents and the AVAP, and with regard to a high-intensity, freeway serving business in their council area—a Taco Bell restaurant with drive-through—contraindicating Community Commercial zoning requirements for “community serving” businesses and low-intensity use. The Board of Supervisors subsequently approved the project without the drive-through portion, respecting Acton's request for prohibiting “high-intensity” use intending to support a freeway-serving business.

The Association of Rural Town Councils vigorously supports the low-intensity community-serving development desires of the Acton community, applied through community standards and the Northern County's AVAP, and consistently interpreted by Regional Planning. The association supports the preservation of the rural, equestrian, and agricultural aspects of the lifestyle chosen by its residents, not corporate interests who build and leave. The decision by the Board of Supervisors to restrict high-intensity use for the Taco Bell Project has set a precedent that should apply to all future commercial development within the Acton Town Council area, including this Primo Burger/Retail Store Project.

I have attached the ARTC's letter to the Board of Supervisors regarding the Taco Bell Project. It enumerates many points valid and applicable to the project now being heard, since it is in direct proximity to the currently proposed project, and will produce the same effects, i.e., traffic affecting young pedestrians traveling to and from the Acton Library and middle school; underestimation of traffic impacts; its actual “high intensity” use, not community-serving business; and inconsistent interpretation of CSDs and the AVAP meant to preserve the unique character and the rural qualities of the community of Acton. Please take time to read the last paragraph of the attached letter. It especially hones in on the perspective of the ARTC and town councils and their relationships with planning documents that intend protection and preservation of rural communities.

We appreciate the opportunity to comment and respectfully request that the Primo Burger Project and drive-through be denied a Conditional Use Permit, unless the project can be further revised to adhere to the Acton CSD, and the zoning and AVAP protections from high-intensity uses.

Sincerely,



Susan Zahnter  
Interim Director

CC: 5<sup>th</sup> District Planning Deputy Edel Vizcarra, Antelope Valley Field Deputy Christine Borzaga, Assistant Deputy Richard Grooms.

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19 November 2015

SENT VIA EMAIL

Mayor Michael D. Antonovich  
Supervisors Solis, Ridley-Thomas, Kuehl, and Knabe  
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Los Angeles County Board of Supervisors  
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Dear Mayor Antonovich and Supervisors Solis, Kuehl, Ridley-Thomas, and Knabe,

Subject: The Regional Planning Commission's Recent Interpretation of the Newly Adopted Antelope Valley Area "Town and Country" Plan; Reference: Project R2014-02996; RCUP #T2014-00142, The Acton Town Council Appeal Filed Sept 29, 2015

The Association of Rural Town Councils, representing signatory Councils (Acton, Antelope Acres, Quartz Hill, The Lakes, Lake Los Angeles, Leona Valley, Three Points-Liebre Mountain, and the community group Concerned Citizens of the West Antelope Valley), is concerned by a recent interpretation of the newly adopted "Town and Country"--Antelope Valley Area Plan made by the Regional Planning Commission in issuing a Conditional Use Permit for the referenced project on September 16th. Specifically, the Commission found that a freeway-serving, drive-through commercial development which would pull 1,000 vehicles per day off the freeway and into the rural, equestrian community of Acton is consistent with the Antelope Valley Area Plan even though the Plan specifically **prohibits** such development. This poses further questions regarding county interpretation of Community Standards Districts documents that rural town councils rely upon for directing uses and development and determining compatibility with their unique rural surroundings.

In approving the fast food "drive-through" project, the Commission has ignored the following:

- Commuters will comprise more than 90% of the customers, which violates provisions of the Antelope Valley Area Plan that limit commercial development in Acton to be "local commercial uses that serve community residents" (page COMM-3). It also violates provisions of the plan that prohibit "commercial uses that serve travelers along State Route 14" (page COMM-4).
- The project generates traffic levels beyond the point where traffic signals are required. This violates provisions of the Antelope Valley Area Plan which explicitly limit development that results in traffic signals because they "do not fit with the community's unique rural character and identity" (page COMM-4).

- According to the Institute of Traffic Engineers, fast food "drive-through" businesses generate the highest possible traffic loads per unit area, and are second only to convenience stores. The fast food "drive through" business approved by the Commission is a "high intensity use", and it violates provisions of the Plan that prohibit "high-intensity commercial uses" in Acton (page COMM-4).

- According to the developer, the fast food "drive-through" business is intended to serve travelers on the 14 Freeway, and is specifically located in Acton for this purpose. The project will serve regional customers traveling to and from urban areas in the Antelope Valley, Santa Clarita Valley, and the greater Los Angeles basin. It is clearly a "regional" use and therefore violates provisions of the Antelope Valley Area Plan that prohibit "regional" commercial uses in Acton (page COMM-4).

Town councils, their constituents, and residents from the unincorporated communities of the Antelope Valley worked very hard over the last 10 years to ensure that the "Town and Country"--Antelope Valley Area Plan would provide the guidelines necessary to direct future development in a manner that preserves community identity, protects community residents, and enhances community lifestyles. If Regional Planning's approval is maintained by the Board of Supervisors, statements used by Planning to prove compatibility of the project will also assure the time and effort put forth by town councils and unincorporated area residents working for protection and preservation of their unique rural communities and rural lifestyles will be for naught. Please do not allow the plain, unambiguous language of the Plan to be misinterpreted in order to approve this project, which will allow high-intensity commercial developments now, and may open the door for other "regional" projects. Town Councils also deserve to know the true intent and interpretation of language in the Plan, and if such language will actually provide any consistency with regard to this project, future projects, and Community Standards Districts, when applied to planning review. For these reasons, the Association of Rural Town Councils supports the Acton Town Council's appeal and respectfully asks that the permit for the proposed project be denied.

Yours truly,



Susan Zahnter  
Interim Director

CC: 5<sup>th</sup> District Planning Deputy Edel Vizcarra, Antelope Valley Field Deputy Christine Borzaga, Antelope Valley Staff Assistant Deputy Richard Grooms